

AO 91 (Rev 8/01) Criminal Complaint

United States Courts

Southern District of Texas

FILED

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

December 16, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Case Number:

M-22-2400-M

Wilfredo Lainez-Corea

PRINCIPAL

Ct. 1 YOB: 1998

Honduras

Carlos Alfredo Colex-Medina

CO-PRINCIPAL

Ct. 2 YOB: 1987

Mexico

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 14, 2022 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

Ct. 1 knowing or in reckless disregard of the fact that Walter Samuel Velis-Gomez, a citizen and national of El Salvador, along with another undocumented alien, for a total of two (2), who had entered the United States in violation of law, transported, or moved or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in San Juan, Texas to the point of arrest in San Juan, Texas,

Ct. 2 knowing or in reckless disregard of the fact that Rudy Joj-Hernandez, a citizen and national of Guatemala, along with two (2) other undocumented aliens, for a total of three (3), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to wit: a residence located in San Juan, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(1)(A)(iii)

I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On December 14, 2022, at approximately 10:00 a.m., Border Patrol camera operator observed a black Chevrolet Silverado picking up three (3) suspected undocumented aliens near the Rio Grande River in McAllen, Texas. The agent relayed his observations to nearby agents. The camera operator maintained visual of the Silverado and guided the responding agents to the location of the Silverado. The agents followed the Silverado to a store in Mission, Texas, and observed three (3) subjects exit the Silverado and approach a female inside the store. The female and three (3) subjects exited the store and boarded a Chevrolet Cruze which agents followed to a bank in San Juan, Texas. At the bank, two (2) males exited the Cruze and boarded a white Chevrolet Sonic, driven by a male subject. Agents followed the Sonic to an apartment complex in San Juan, Texas and was later seen departing the complex. Agents and Hidalgo County Sheriff's Office (HCSO) Deputies, who were contacted for assistance with the investigation and followed the Sonic to a parking lot in San Juan. Agents and deputies approached the driver, who was sitting outside the Sonic on his cellphone, and identified themselves as law enforcement.

Continued on the attached sheet and made a part of this complaint:  
Complaint Authorized by AUSA A. Garcia

☒ Yes ☐ No

/s/ Christian Salmon

Signature of Complainant

Submitted by reliable electronic means, sworn to and attested telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

Christian Salmon Border Patrol Agent

Printed Name of Complainant

December 16, 2022 at 1:50 p.m.  
Date

at McAllen, Texas  
City and State

J. Scott Hacker, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-22-2400-M**

**RE: Wilfredo Lainez-Corea  
Carlos Alfredo Colex-Medina**

**CONTINUATION:**

The driver, identified as Wilfredo Lainez-Corea, a Mexican National. Agents and Deputies proceeded to interview the two (2) back seat passengers who were determined to be illegally present in the United States (U.S.). Lainez was advised of his Miranda Rights and agreed to speak to agents. Lainez admitted he rents an apartment located in San Juan, with his friend Carlos. Lainez also provided verbal and written consent to enter his apartment.

Agents and Deputies approached the apartment located in San Juan, Texas and conducted a knock-and-talk. A male subject, identified as Carlos Colex-Medina, opened the door for the agents and freely admitted to being illegally present in the U.S. After searching the apartment, three (3) subjects were found and were determined to be illegally present in the U.S. Colex admitted he knew the subjects found in his apartment were illegally present in the U.S. and indicated he and his friend Wilfredo paid \$550 in rent.

Wilfredo Lainez, Carlos Colex-Medina, and a total of five (5) undocumented aliens were arrested and transported to McAllen Border Patrol Station for processing. No other arrests were made.

**PRINCIPAL STATEMENT 1:**

Wilfredo Lainez-Corea, a citizen and national from Honduras was read his Miranda Rights. He understood his Rights and agreed to provide a statement.

Lainez stated he pays Carlos Alfredo Colex-Medina \$200 a month to live in the apartment and claims he has been living in the apartment for about fifteen (15) days. He also indicated he was aware that he was detained for transporting undocumented aliens. He claimed he did not know that the people he was transporting were undocumented aliens. When asked what his friend Carlos did for work, he said that Carlos transported and harbored undocumented aliens. Lainez said that Carlos told him that since he lives at the apartment with him, he had to help him transport people. Lainez mentioned that Carlos called him and told him to pick up two (2) subjects. While transporting the two (2) subjects Carlos kept calling him on the phone and telling him to take the subjects to different places which made dropping them off take longer. Lainez also stated that Carlos provided food and gave instructions to the undocumented aliens

Lainez was shown a photo lineup and positively identified Carlos Alfredo Colex-Medina as the person that told him to pick up the people.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-22-2400-M**

**RE: Wilfredo Lainez-Corea  
Carlos Alfredo Colex-Medina**

**CONTINUATION:**

**PRINCIPAL STATEMENT 2:**

Carlos Alfredo Colex-Medina, a Mexican citizen was read his Miranda Rights. He understood and agreed to provide a sworn statement without the presence of an attorney.

Colex said he paid \$500 to be smuggled into the United States. Colex said he pays \$550 per month for rent and lives in San Juan, Texas. He received a call from Mexico telling him that two undocumented aliens were ready to be picked up. He then called his friend, Wilfredo Lainez-Corea and told him to pick up the undocumented aliens with his white Chevrolet Sonic. Colex said that his friend has picked up undocumented aliens for him in the past. Colex told the undocumented aliens where to sleep, shower, eat and provided them with needed essentials. Colex said that the undocumented aliens had freedom of movement. He said he is getting paid \$400 every two (2) days to for the food and other supplies and gets paid \$50 per day, per person to harbor in his apartment. Colex said he has smuggled approximately thirty (30) to forty (40) undocumented aliens within the past three (3) years. Colex said that he has been arrested for alien smuggling before. Colex also mentioned his friend pays for the utilities and picks up undocumented aliens in exchange for staying in the apartment. He said his friend has always known that the people he has in the apartment were undocumented aliens.

Colex was provided with a photo lineup and identified his friend Wilfredo Lainez-Corea.

**MATERIAL WITNESS STATEMENT 1:**

Walter Veliz-Gomez a citizen and national of El Salvador, was read his Miranda Rights. He understood his Rights and agreed to provide a statement.

Veliz stated a family member made the arrangements for him to be smuggled into the United States to Maryland but did not know how much was paid. Veliz said that he crossed the Rio Grande River with 2 other subjects and was picked up by a black vehicle where he and another subject were transferred to a white vehicle driven by Wilfredo Lainez-Corea. Veliz stated they stopped at an apartment complex where he was instructed to wait outside while the driver went inside the apartment complex. Shortly thereafter, Veliz stated he left with the driver from the apartment complex and was encountered by law enforcement.

Veliz identified Wilfredo Lainez-Corea, through a photo line-up, as the driver of the white vehicle.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-22-2400-M**

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**RE: Wilfredo Lainez-Corea  
Carlos Alfredo Colex-Medina  
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**CONTINUATION:**

**MATERIAL WITNESS STATEMENT 2:**

Rudy Joj-Hernandez a citizen and national of El Salvador, was read his Miranda Rights. He understood his right and agreed to provide a statement.

Hernandez stated he made his own arrangements to be smuggled into the United States to Boston, Massachusetts, and he was to pay \$15,000 upon arrival. Hernandez said he crossed the Rio Grande River with several other subjects and were later taken to an apartment complex. Hernandez added when he entered the apartment, he was greeted by one (1) male subject who told him to get comfortable and don't leave the apartment. Shortly thereafter, Hernandez stated he was encountered by law enforcement.